

Defendants.

[illegible]

This Document Relates to All Cases

2. On September 25, 2017, all but two Plaintiffs included on Plaintiff List #2 served responses to the Interrogatories served upon them pursuant to the Phase One Scheduling Order. The Parties will meet and confer as to the disposition of those Plaintiffs who have not responded to the Interrogatories.

3. On September 25, 2017, certain Plaintiffs not included on Plaintiff List #1 provided Defendants with executed Medical Authorizations. A number of Plaintiffs, however, did not provide Medical Authorizations. On October 25, 2017, Defendants' filed an unopposed motion compelling production of Medical Authorizations from non-responsive Plaintiffs. On October 26, 2017, the Court granted that motion, and ordered non-responsive Plaintiffs to produce executed Medical Authorizations no later than December 8, 2017.

4. On September 25, 2017, Plaintiffs served Suggestions of Death upon the record regarding the death of eight (8) Plaintiffs.

5. On October 13, 2017, Defendant United States Pipe and Foundry Company, LLC (U.S. Pipe) served on certain Plaintiffs five (5) Interrogatories and twelve (12) Requests for Production.

6. Plaintiffs' and Defendants' counsel have conferred to discuss Plaintiffs' responses to the Interrogatories and Requests for Production, served by U.S. Pipe on October 13, 2017. Counsel have agreed that Plaintiffs will make a rolling production of those responses, as set forth in the attached Joint Proposed Scheduling Order.

7. Plaintiffs' and Defendants' counsel have further conferred multiple times by phone, and communicated by letter and email, to discuss discovery planning related to Phase Two discovery in these consolidated cases. Attached hereto as Exhibit A is the Parties' Joint Proposed Scheduling Order for Phase Two discovery. At the

conclusion of Phase Two discovery, the Parties intend to identify a process for selecting and working up certain plaintiffs for trial.

Respectfully submitted this 30th day of November 2017.

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

WILLIE ABNER, et al.,)	
)	
Plaintiffs,)	Civil Action File No. 2:15-cv-02040-
)	KOB
)	
v.)	
)	This Document Relates to All Cases
UNITED STATES PIPE AND)	
FOUNDRY COMPANY, LLC, et al.,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that on this the 30th day of November, 2017, I have served a copy of the foregoing upon all counsel of record, via the Court's electronic filing, which will automatically give notice of such filing to:

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